

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
	:	
v.	:	DATE FILED: _____
	:	
CONNIE MACDONALD	:	VIOLATION: 18 U.S.C. § 1344
	:	(Bank fraud - 6 counts)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Madison Bank was a financial institution with branches located within the Eastern District of Pennsylvania. Its deposits were insured by the Federal Deposit Insurance Corporation ("FDIC").

2. From on or about April 30, 2002, through on or about May 6, 2002, in the Eastern District of Pennsylvania, defendant

CONNIE MACDONALD

knowingly executed and attempted to execute a scheme to defraud Madison Bank and to obtain monies owned by and under the care, custody and control of the Bank by means of false and fraudulent pretenses, representations and promises.

THE SCHEME

It was part of the scheme that from on or about April 30, 2002, through on or about May 6, 2002:

3. Defendant CONNIE MACDONALD possessed a false identification document for the purpose of using it for identification to cash counterfeit checks.

4. Defendant CONNIE MACDONALD, while posing as a woman identified here by the initials "A.M.," cashed three counterfeit checks totaling approximately \$5,158.35 at various branches of Madison Bank, each counterfeit check having been made payable to A.M.

In violation of Title 18, United States Code, Section 1344.

## COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Beneficial Savings Bank was a financial institution with branches located within the Eastern District of Pennsylvania. Its deposits were insured by the FDIC.

2. From on or about May 3, 2002, through on or about May 4, 2002, in the Eastern District of Pennsylvania, defendant

CONNIE MACDONALD

knowingly executed and attempted to execute a scheme to defraud Beneficial Savings Bank and to obtain monies owned by and under the care, custody and control of the Bank by means of false and fraudulent pretenses, representations and promises.

### THE SCHEME

It was part of the scheme that on or about May 3, 2002, through on or about May 4, 2002:

3. Defendant CONNIE MACDONALD possessed a false identification document for the purpose of using it for identification to cash counterfeit and fraudulent checks.

4. Defendant CONNIE MACDONALD, while again posing as a woman named A.M., cashed five counterfeit checks totaling approximately \$8,922.45 at various branches of Beneficial Savings Bank, each counterfeit check having been made payable to A.M.

In violation of Title 18, United States Code, Section 1344.

### COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Sovereign Bank was a financial institution with branches located within the Eastern District of Pennsylvania. Its deposits were insured by the FDIC.
2. From on or about May 10, 2002, through on or about May 13, 2002, in the Eastern District of Pennsylvania, defendant

#### CONNIE MACDONALD

knowingly executed and attempted to execute a scheme to defraud Sovereign Bank and to obtain monies owned by and under the care, custody and control of the Bank by means of false and fraudulent pretenses, representations and promises.

#### THE SCHEME

It was part of the scheme that from on or about May 10, 2002, through on or about May 13, 2002:

3. Defendant CONNIE MACDONALD possessed a false identification document for the purpose of using it for identification to cash counterfeit and fraudulent checks.
4. Defendant CONNIE MACDONALD, while posing as a woman identified here by the initials "C.M.," cashed three counterfeit checks totaling approximately \$4,961.88 at various branches of Sovereign Bank, each counterfeit check having been made payable to C.M.

In violation of Title 18, United States Code, Section 1344.

#### COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Sovereign Bank was a financial institution with branches located within the Eastern District of Pennsylvania. Its deposits were insured by the FDIC.
2. From on or about May 23, 2002, through on or about May 24, 2002, in the Eastern District of Pennsylvania, defendant

CONNIE MACDONALD

knowingly executed and attempted to execute a scheme to defraud Sovereign Bank and to obtain monies owned by and under the care, custody and control of the Bank by means of false and fraudulent pretenses, representations and promises.

#### THE SCHEME

It was part of the scheme that from on or about May 23, 2002, through on or about May 24, 2002:

3. Defendant CONNIE MACDONALD possessed a false identification document for the purpose of using it for identification to cash counterfeit and fraudulent checks.
4. Defendant CONNIE MACDONALD, while posing as a woman identified here by the initials "A.L.B.," cashed three counterfeit checks totaling approximately \$5,332.65 at various branches of Sovereign Bank, each counterfeit check having been made payable to A.L.B.

In violation of Title 18, United States Code, Section 1344.

## COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Bank of Lancaster County was a financial institution with branches located within the Eastern District of Pennsylvania. Its deposits were insured by the FDIC.

2. From on or about June 6, 2002, through on or about July 23, 2002, in the Eastern District of Pennsylvania, defendant

CONNIE MACDONALD

knowingly executed and attempted to execute a scheme to defraud Bank of Lancaster County and to obtain monies owned by and under the care, custody and control of the Bank by means of false and fraudulent pretenses, representations and promises.

### THE SCHEME

3. It was part of the scheme that from on or about June 6, 2002, through on or about July 23, 2002, defendant CONNIE MACDONALD possessed a false identification document for the purpose of using it for identification to cash counterfeit and fraudulent checks.

4. It was part of the scheme that on or about June 6, 2002, defendant CONNIE MACDONALD, while posing as a woman identified here by the initials "D.M.," fraudulently opened a bank account in the name of D.M. and in the name of D.M.'s business at Bank of Lancaster County.

5. It was part of the scheme that from on or about July 18, 2002, through on or about July 19, 2002, defendant CONNIE MACDONALD, while posing as D.M., deposited two counterfeit checks totaling approximately \$36,387.29 into the fraudulent D.M. personal account

at Bank of Lancaster County.

6. It was part of the scheme that on about July 23, 2002, defendant CONNIE MACDONALD, while posing as D.M., cashed two fraudulent checks totaling approximately \$15,350 at Bank of Lancaster County, each fraudulent check having been made payable to cash and drawn on the fraudulent D.M. personal account at Bank of Lancaster County.

In violation of Title 18, United States Code, Section 1344.

## COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Farmers First Bank was a financial institution with branches located within the Eastern District of Pennsylvania. Its deposits were insured by the FDIC.
2. From on or about July 15, 2002, through on or about July 24, 2002, in the Eastern District of Pennsylvania, defendant

### CONNIE MACDONALD

knowingly executed and attempted to execute a scheme to defraud Farmers First Bank and to obtain monies owned by and under the care, custody and control of the Bank by means of false and fraudulent pretenses, representations and promises.

### THE SCHEME

3. It was part of the scheme that from on or about July 15, 2002, through on or about July 24, 2002, defendant CONNIE MACDONALD possessed a false identification document for the purpose of using it for identification to cash counterfeit and fraudulent checks.
4. It was part of the scheme that from on or about July 15, 2002, through on or about July 17, 2002, defendant CONNIE MACDONALD, while posing as a woman identified here by the initials "S.R.," deposited two counterfeit checks totaling approximately \$37,175.33 into a fraudulent bank account opened in the name S.R. at Farmers First Bank.
5. It was part of the scheme that on or about July 23, 2002, defendant CONNIE MACDONALD, while posing as S.R., cashed two fraudulent starter checks totaling approximately \$15,350 at Farmers First Bank, each fraudulent starter check having been made



payable to cash and drawn on the fraudulent S.R. account at Farmers First Bank.

6. It was part of the scheme that on or about July 24, 2002, defendant CONNIE MACDONALD, while posing as S.R., attempted to cash a fraudulent \$7,800 starter check at First Farmers Bank, which starter check was made payable to cash and drawn on the fraudulent S.R. account at Farmers First Bank.

In violation of Title 18, United States Code, Section 1344.

A TRUE BILL:

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FOREPERSON

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PATRICK L. MEEHAN  
United States Attorney